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Chris Hladick, Regional Administrator
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EPA

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SEATTLE, WASHINGTON 98112
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June 16, 2019

Via Certified Mail - Return Receipt Requested

Managing Agent
PSF Mechanical, Inc.
11621 East Marginal Way S, Suite A
Seattle, WA 98168

Managing Agent
PSF Mechanical, Inc.
9322 14th Ave S
Seattle, WA 98108

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days' notice of Waste Action Project's intent to file a citizen suit against PSF Mechanical, Inc. ("PSF"), under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by PSF's National Pollution Discharge Elimination System ("NPDES") permit.

PSF was granted coverage under the Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") effective January 2, 2015 and expired on December 31, 2019, under NPDES No. WAR000264 (the "2015 Permit"). Ecology granted PSF coverage under the current iteration of the ISGP effective January 1, 2020, and set to expire on December 31, 2024 (the "2020 Permit") and maintains the same permit number, WAR000264.

PSF has violated and continues to violate effluent standards and limitations under the CWA (see 33 U.S.C. § 1365(a) and (f)) including the terms and conditions of the 2015 Permit and the 2020 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or about 9322 14th Ave S, Seattle, WA 98108 (the "facility") as described herein, to the Duwamish River. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by PSF.

I. COMPLIANCE WITH WATER QUALITY STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that PSF's discharges not cause or contribute to an excursion of Washington State water quality standards.

PSF discharges to the Duwamish River which does not meet water quality standards for sediment quality and is included on the state's "303(d) list" of impaired water bodies. PSF discharges stormwater that contains elevated levels of turbidity, copper, zinc, and total suspended solids ("TSS") as indicated in Table 1 and Table 2. These discharges cause and/or contribute to violations of water quality standards for turbidity, copper, and zinc in the Duwamish River and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See* Fresh water designated uses and criteria, WAC 173-201A-200 (1)(a), (b), (e), (g), (2)(a), (4); Toxic Substances, WAC 173-201A-240 (including criteria for copper, zinc); Natural conditions and other water quality criteria and applications, WAC 173-201A-260 (including toxics and aesthetics criteria); Use designations – Fresh waters, WAC 173-201A-600; Use designations for fresh waters by water resource inventory area, WAC 173-201A-602 (showing the Duwamish River as part of water resource inventory area 9 and listing use designations). Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 1: Monitoring Point 001 Benchmark Exceedances			
Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 µg/L)	Zinc (Benchmark 117 µg/L)
1st Quarter 2015		18	220
2nd Quarter 2016		39.4	
3rd Quarter 2016	39	17.3	
1st Quarter 2019			238.75
3rd Quarter 2019		18.5	267.05

B. Compliance with Standards.

Condition S10.C of the Permits requires PSF to apply all known and reasonable methods of prevention, control, and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). PSF has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Table 1, Table 2, and as described below in this notice of intent to sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. PSF has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this notice of intent to sue.

II. EFFLUENT LIMITATION VIOLATIONS.

Condition S6.C.1 of the Permits requires Permittees discharging to a "303(d)-listed" waterbody (Water Quality Category 5), either directly or indirectly through a stormwater drainage system must comply with the applicable sampling requirements and numeric effluent limits in Table 6 of the Permits. The "applicable sampling requirements and numeric effluent limits" means the sampling and effluent limits in Table 6 that correspond to the specific parameter(s) the receiving water is 303(d)-listed for at the time of permit coverage, or TSS if the waterbody is 303(d)-listed for sediment quality at the time of permit coverage.

PSF discharges via stormwater system to a culvert along South 95th Street, which then discharges to the Duwamish River, which is 303(d)-listed for sediment quality. PSF's discharges are subject to a maximum daily effluent limitation of 30 mg/L for TSS. PSF discharges stormwater that contains elevated levels of TSS in excess of the corresponding numeric effluent limitation, as indicated in Table 2 below. Each and every one of these discharges is a separate violation of the Permits.

Table 2: Monitoring Point 001 Effluent Limitation Violations	
Quarter in which sample collected	TSS (Effluent Limitation 30 mg/L)
2nd Quarter 2016	48
3rd Quarter 2016	80
4th Quarter 2016	39

III. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

PSF is in violation of the Permits' SWPPP provisions as follows:

1. Condition S3.A.1 of the Permits requires PSF to develop and implement a SWPPP as specified. Condition S3.A.2 of the Permits requires the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. PSF has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires PSF to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. PSF has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented, and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. *See Stormwater Management Manual for Western Washington,* July 2019, https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/Content/Resources/DocsForDownload/2019SWMMWW.pdf. PSF's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy. Some of the BMPs that PSF is failing to implement include maintaining current monthly site inspection reports in the SWPPP, clearly showing the connectivity between the drainage system and the plumbing of the treatment system in the facility diagram, clearly indicating the location of spill kits and areas of greater risk for spills, cleaning sediment out of catch basin CB#2, maintaining the boom surrounding CB#3 which contains the treatment intake,

maintaining the boom surrounding compressors, and maintaining compressors to eliminate oil blow-by, as indicated by the January 7, 2015 Ecology Inspection Report

4. PSF's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours, and seasonal variations in business hours or in industrial activities as required.

5. PSF's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. PSF's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. PSF's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. PSF's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

9. Condition S3.B.4 of the Permits also requires that permittees include in their SWPPPs and implement mandatory BMPs subject to the same conditions. PSF is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

10. PSF's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs. PSF fails to include operation source control BMPs in the following categories: good housekeeping (including the definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how PSF will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

11. PSF's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

12. PSF's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. PSF's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

13. PSF's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

14. PSF's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff

responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

IV. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires PSF to collect a sample of its stormwater discharge once during every calendar quarter. PSF violated this requirement by failing to collect stormwater samples for Sample Point 001 during the 2nd quarter of 2015, 4th quarter of 2018, and 1st quarter of 2020.

Condition S4.B.2.c of the 2015 Permit and S4.B.3.a of the 2020 Permit require PSF to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria but require the collection of a sample even if the criteria cannot be met. The facility has at least one distinct point of discharge off-site: Outfall 001. There are additional unnamed distinct discharge points.

PSF has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site including sheet flow coming off the southeastern corner of the site by the shipping and receiving building which goes to an off-site storm drain. These violations have occurred and continue to occur each and every quarter during the last five years that PSF was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until PSF commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires PSF to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen. Condition S5.B.1 of the Permits requires PSF to analyze stormwater samples collected quarterly for total lead and petroleum hydrocarbons. Condition S6.C.1 of the Permits requires PSF to analyze stormwater samples collected quarterly for TSS.

PSF violated these conditions by failing to analyze stormwater samples as described in Table 3 below:

Table 3: Parameters Not Analyzed

Monitoring Period	Parameters Not Analyzed
1st Quarter 2015	TSS
2nd Quarter 2015	Turbidity, pH, oil sheen, copper, zinc, TSS, lead, petroleum hydrocarbons
4th Quarter 2018	Turbidity, pH, oil sheen, copper, zinc, TSS, lead, petroleum hydrocarbons
1st Quarter 2020	Turbidity, pH, oil sheen, copper, zinc, TSS, lead, petroleum hydrocarbons

C. Failure to Correctly and Timely Submit Discharge Monitoring Reports.

Condition S9.A of the 2015 Permit and Condition S9.B of the 2020 Permit require PSF to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. PSF has violated these conditions by failing to submit a DMR within the time prescribed for the 3rd quarter of 2015, 4th quarter of 2015, 2nd quarter of 2018, 1st quarter of 2019, 2nd quarter of 2019, 3rd quarter of 2019, and 1st quarter of 2020.

D. Failure to Correctly and Timely Submit Annual Reports.

Condition S9.B of the 2015 Permit and S9.C of the 2020 Permit require PSF to submit an accurate and complete Annual Report to Ecology no later than May 15th of each year. The Annual Report must include corrective action documentation as required in Condition S8.B–D of the Permits. If a corrective action is not yet completed at the time of submission of the Annual Report, PSF must describe the status of any outstanding corrective action. Specific information to be included in the Annual Report is: (1) identification of the conditions triggering the need for corrective action; (2) a description of the problem and identification of dates discovered; (3) a summary of any Level One, Two, or Three Corrective Actions completed during the previous calendar year including the dates corrective actions completed; and (4) a description of the status of any Level Two or Three Corrective Actions triggered during the previous calendar year, including identification of the date PSF expects to complete corrective actions.

PSF violated these conditions by failing to include that it triggered Level One Corrective Action for copper in the 2015 Annual Report. PSF also violated this condition and continues to violate this condition by failing to submit Annual Reports for 2018 and 2019.

E. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that a monthly visual inspection be conducted at the facility by qualified personnel. Condition S7.B of the Permits requires each inspection to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged; observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges; observations for the presence of illicit discharges; a verification that the descriptions of potential pollutant sources required by the permit are accurate; a verification that the site map in the SWPPP reflects current conditions; and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed). PSF has violated and continues to violate these requirements because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections each and every month, including failing to monitor for oil sheen the 2nd quarter of 2015 and the 4th quarter of 2018.

Condition S7.C of the Permits requires that PSF record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection; the locations inspected; a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits; a summary report and schedule of implementation of the remedial actions that PSF plans to take if the site inspection indicates that the facility is out of compliance; the name, title, signature and certification of the person conducting the facility inspection; and a certification and signature of the responsible corporate officer or a duly authorized representative. PSF is in violation of these requirements because, during the last five years, it has failed to prepare and maintain the requisite inspection reports or checklists and failed to make the requisite certifications and summaries as indicated by the January 7, 2015 Ecology Inspection Report, which stated that the monthly inspection reports were not added to SWPPP binder.

V. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements.

Condition S8.B of the Permits requires PSF take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires that within 14 days of receipt of sampling results that indicate a benchmark exceedance during a given quarter; or, for parameters other than pH or visible oils sheen, the end of the quarter, whichever is later, PSF: (1) conduct an inspection to investigate the cause; (2) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (3) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges; (4) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits; and (5) and sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 and 3 of the Permits establishes the following benchmarks: turbidity 25 NTU; pH 5–9 SU; total copper 14 µg/L; total zinc 117 µg/L; no visible oil sheen; and petroleum hydrocarbons 10 mg/L. The 2015 Permit establishes the benchmark for total lead as 81.6 µg/L and the 2020 Permit establishes the benchmark as 64.6 µg/L.

PSF has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required

review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the Annual Report each time since January 1, 2015, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range, including the benchmark exceedances listed in Table 1. These violations include failing to fully implement the SWPPP revisions for the Level One Corrective Action for copper that was triggered in the 2nd quarter of 2016 by the DMR due date of August 15, 2015.

B. Violations of the Level Two Requirements.

Condition S8.C of the Permits requires PSF take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for any two quarters during a calendar year.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires PSF: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges; (3) summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits; and (4) sign, certify, and implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The Permits establish the benchmarks applicable to PSF described in section V.A of this notice of intent to sue letter and Condition S5.A of the Permits.

PSF has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action for discharge from its facility in accordance with Permits' conditions, including the required review, revision and certification of the SWPPP; the required implementation of additional BMPs, including additional structural source control BMPs; and the required summarization in the Annual Report each time since January 1, 2015, quarterly stormwater sampling results from the facility were greater than a benchmark or outside the benchmark range for any two quarters during a calendar year. PSF has violated and continues to violate these requirements by failing to perform a Level Two Corrective Action for copper when Level Two Corrective Action was triggered in the 3rd quarter of 2016, as indicated by the benchmark exceedances in Table 1.

VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B of the Permits requires PSF record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if

PSF collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why PSF could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. PSF is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the 2015 Permit and S9.D of the 2020 Permit require PSF to retain for a minimum of five years a copy of the current Permit, a copy of PSF's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. PSF is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VII. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the 2015 Permit and Condition S9.F of the 2020 Permit require PSF to take certain actions in the event PSF is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit. In such circumstances, PSF must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and PSF must immediately notify the appropriate Ecology regional office of the failure to comply. PSF must then submit a detailed written report to Ecology, including specified details, within 5 days of the time PSF became aware of the circumstances unless Ecology requests an earlier submission.

PSF routinely violates these requirements, including each and every time PSF exceeded the numeric effluent limitation, as specified in Table 2 above, each and every time PSF failed to comply with the corrective action requirements described in section V of this notice of intent to sue, and each and every time PSF discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks, as described in Table 1 above. All these violations may endanger human health or the environment.

VIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, Waste Action Project hereby requests that PSF provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should PSF fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

IX. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation that occurred through November 2, 2015, and $55,800 per day for each violation that occurred thereafter. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believe that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against PSF under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

SMITH & LOWNEY, PLLC

By: _____
Richard Smith

cc: Andrew Wheeler, Administrator, U.S. EPA
Chris Hladick, Region 10 Administrator, U.S. EPA
Laura Watson, Director, Washington Department of Ecology
Hillis Clark Martin & Peterson PS, Registered Agent (999 3rd Ave, Suite 4600, Seattle, WA, 98104)

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/1/15	0	1/29/15	0	2/26/15	0.26	3/26/15	0
1/2/15	0.03	1/30/15	0	2/27/15	0.69	3/27/15	0.01
1/3/15	0.01	1/31/15	0	2/28/15	0	3/28/15	0
1/4/15	0.21	2/1/15	0.04	3/1/15	0	3/29/15	0
1/5/15	0.07	2/2/15	0.3	3/2/15	0	3/30/15	0.04
1/6/15	0.01	2/3/15	0.03	3/3/15	0	3/31/15	0.36
1/7/15	0	2/4/15	0.32	3/4/15	0	4/1/15	0.05
1/8/15	0	2/5/15	0.9	3/5/15	0	4/2/15	0
1/9/15	0.01	2/6/15	0.75	3/6/15	0	4/3/15	0.05
1/10/15	0.19	2/7/15	0.82	3/7/15	0	4/4/15	0
1/11/15	0.06	2/8/15	0.15	3/8/15	0	4/5/15	0
1/12/15	0	2/9/15	0.15	3/9/15	0	4/6/15	0
1/13/15	0	2/10/15	0.02	3/10/15	0.02	4/7/15	0.01
1/14/15	0	2/11/15	0	3/11/15	0.08	4/8/15	0
1/15/15	0.43	2/12/15	0.02	3/12/15	0	4/9/15	0
1/16/15	0	2/13/15	0	3/13/15	0.09	4/10/15	0.54
1/17/15	0.84	2/14/15	0.06	3/14/15	0.63	4/11/15	0
1/18/15	0.24	2/15/15	0	3/15/15	2.45	4/12/15	0
1/19/15	0.03	2/16/15	0	3/16/15	0	4/13/15	0.55
1/20/15	0	2/17/15	0	3/17/15	0.04	4/14/15	0.06
1/21/15	0	2/18/15	0	3/18/15	0	4/15/15	0
1/22/15	0.03	2/19/15	0.03	3/19/15	0.01	4/16/15	0
1/23/15	0.08	2/20/15	0.02	3/20/15	0.13	4/17/15	0
1/24/15	0.02	2/21/15	0	3/21/15	0.14	4/18/15	0
1/25/15	0.01	2/22/15	0	3/22/15	0.07	4/19/15	0
1/26/15	0	2/23/15	0	3/23/15	0.21	4/20/15	0
1/27/15	0.02	2/24/15	0	3/24/15	0.28	4/21/15	0.16
1/28/15	0	2/25/15	0.07	3/25/15	0.13	4/22/15	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/23/15	0.1	5/21/15	0	6/18/15	0	7/16/15	0
4/24/15	0.16	5/22/15	0	6/19/15	0.07	7/17/15	0
4/25/15	0.01	5/23/15	0	6/20/15	0	7/18/15	0
4/26/15	0	5/24/15	0	6/21/15	0	7/19/15	0
4/27/15	0	5/25/15	0	6/22/15	0	7/20/15	0
4/28/15	0.12	5/26/15	0	6/23/15	0	7/21/15	0.13
4/29/15	0	5/27/15	0	6/24/15	0	7/22/15	0
4/30/15	0	5/28/15	0	6/25/15	0	7/23/15	0
5/1/15	0	5/29/15	0	6/26/15	0	7/24/15	0.02
5/2/15	0	5/30/15	0	6/27/15	0	7/25/15	0.01
5/3/15	0	5/31/15	0	6/28/15	0	7/26/15	0.1
5/4/15	0	6/1/15	0.09	6/29/15	0.01	7/27/15	0.01
5/5/15	0.25	6/2/15	0	6/30/15	0	7/28/15	0
5/6/15	0	6/3/15	0	7/1/15	0	7/29/15	0
5/7/15	0	6/4/15	0	7/2/15	0	7/30/15	0
5/8/15	0	6/5/15	0	7/3/15	0	7/31/15	0
5/9/15	0	6/6/15	0	7/4/15	0	8/1/15	0
5/10/15	0	6/7/15	0	7/5/15	0	8/2/15	0
5/11/15	0	6/8/15	0	7/6/15	0	8/3/15	0
5/12/15	0.12	6/9/15	0	7/7/15	0	8/4/15	0
5/13/15	0.13	6/10/15	0	7/8/15	0	8/5/15	0
5/14/15	0	6/11/15	0	7/9/15	0	8/6/15	0
5/15/15	0.01	6/12/15	0	7/10/15	0	8/7/15	0
5/16/15	0	6/13/15	0	7/11/15	0	8/8/15	0
5/17/15	0	6/14/15	0	7/12/15	0	8/9/15	0
5/18/15	0	6/15/15	0	7/13/15	0	8/10/15	0
5/19/15	0	6/16/15	0	7/14/15	0	8/11/15	0
5/20/15	0	6/17/15	0	7/15/15	0	8/12/15	0.04

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/13/15	0	9/10/15	0.01	10/8/15	0	11/5/15	0.01
8/14/15	0.82	9/11/15	0	10/9/15	0.01	11/6/15	0.01
8/15/15	0	9/12/15	0	10/10/15	0.77	11/7/15	0.49
8/16/15	0	9/13/15	0.03	10/11/15	0	11/8/15	0.38
8/17/15	0	9/14/15	0	10/12/15	0.36	11/9/15	0.16
8/18/15	0	9/15/15	0	10/13/15	0.05	11/10/15	0.07
8/19/15	0	9/16/15	0.05	10/14/15	0	11/11/15	0.04
8/20/15	0	9/17/15	0.57	10/15/15	0	11/12/15	0.24
8/21/15	0	9/18/15	0.01	10/16/15	0.01	11/13/15	1.31
8/22/15	0	9/19/15	0	10/17/15	0.04	11/14/15	1.66
8/23/15	0	9/20/15	0.09	10/18/15	0.16	11/15/15	0.73
8/24/15	0	9/21/15	0	10/19/15	0	11/16/15	0.09
8/25/15	0	9/22/15	0	10/20/15	0	11/17/15	0.74
8/26/15	0	9/23/15	0	10/21/15	0	11/18/15	0.05
8/27/15	0	9/24/15	0	10/22/15	0.01	11/19/15	0.08
8/28/15	0.01	9/25/15	0.03	10/23/15	0	11/20/15	0
8/29/15	0.22	9/26/15	0	10/24/15	0.01	11/21/15	0
8/30/15	0.27	9/27/15	0	10/25/15	0.35	11/22/15	0
8/31/15	0.05	9/28/15	0	10/26/15	0.09	11/23/15	0.12
9/1/15	0.18	9/29/15	0	10/27/15	0.01	11/24/15	0.21
9/2/15	0.01	9/30/15	0	10/28/15	0.1	11/25/15	0
9/3/15	0	10/1/15	0.01	10/29/15	0.02	11/26/15	0
9/4/15	0	10/2/15	0.01	10/30/15	0.56	11/27/15	0
9/5/15	0.06	10/3/15	0	10/31/15	0.83	11/28/15	0
9/6/15	0.19	10/4/15	0	11/1/15	0.47	11/29/15	0
9/7/15	0	10/5/15	0	11/2/15	0.07	11/30/15	0.01
9/8/15	0	10/6/15	0.01	11/3/15	0.07	12/1/15	0.39
9/9/15	0	10/7/15	0.38	11/4/15	0	12/2/15	0.07

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/3/15	0.51	12/31/15	0	1/28/16	0.51	2/27/16	0.08
12/4/15	0.12	1/1/16	0	1/29/16	0.18	2/28/16	0.69
12/5/15	0.81	1/2/16	0	1/30/16	0.02	2/29/16	0.11
12/6/15	0.55	1/3/16	0.01	1/31/16	0	3/1/16	0.71
12/7/15	1.07	1/4/16	0.07	2/1/16	0.25	3/2/16	0.27
12/8/15	1.51	1/5/16	0.11	2/2/16	0.02	3/3/16	0.03
12/9/15	0.55	1/6/16	0	2/3/16	0.48	3/4/16	0.21
12/10/15	0.63	1/7/16	0	2/4/16	0.05	3/5/16	0.2
12/11/15	0.01	1/8/16	0	2/5/16	0.15	3/6/16	0.39
12/12/15	0.56	1/9/16	0	2/6/16	0	3/7/16	0.26
12/13/15	0.11	1/10/16	0	2/7/16	0	3/8/16	0.05
12/14/15	0	1/11/16	0.07	2/8/16	0	3/9/16	0.95
12/15/15	0.02	1/12/16	0.52	2/9/16	0	3/10/16	0.32
12/16/15	0.13	1/13/16	0.57	2/10/16	0.16	3/11/16	0.36
12/17/15	0.82	1/14/16	0	2/11/16	0.38	3/12/16	0.02
12/18/15	0.54	1/15/16	0.04	2/12/16	0.85	3/13/16	0.52
12/19/15	0.01	1/16/16	0.41	2/15/16	0.12	3/14/16	0.06
12/20/15	0.19	1/17/16	0.32	2/16/16	0.01	3/15/16	0
12/21/15	0.83	1/18/16	0.05	2/17/16	0.46	3/16/16	0
12/22/15	0.12	1/19/16	0.46	2/18/16	0.12	3/17/16	0
12/23/15	0.09	1/20/16	0.2	2/19/16	0.49	3/18/16	0
12/24/15	0.11	1/21/16	1.27	2/20/16	0	3/19/16	0
12/25/15	0.05	1/22/16	0.27	2/21/16	0.07	3/20/16	0.08
12/26/15	0	1/23/16	0.53	2/22/16	0.01	3/21/16	0.28
12/27/15	0.32	1/24/16	0	2/23/16	0	3/22/16	0.01
12/28/15	0.03	1/25/16	0	2/24/16	0.02	3/23/16	0.13
12/29/15	0	1/26/16	0.27	2/25/16	0	3/24/16	0
12/30/15	0	1/27/16	0.81	2/26/16	0.15	3/25/16	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/26/16	0.09	4/23/16	0.02	5/21/16	0.04	6/18/16	0.04
3/27/16	0.43	4/24/16	0.35	5/22/16	0	6/19/16	0
3/28/16	0	4/25/16	0.02	5/23/16	0	6/20/16	0.56
3/29/16	0	4/26/16	0	5/24/16	0	6/21/16	0.07
3/30/16	0	4/27/16	0	5/25/16	0	6/22/16	0
3/31/16	0	4/28/16	0	5/26/16	0	6/23/16	0.36
4/1/16	0	4/29/16	0.04	5/27/16	0.02	6/24/16	0.13
4/2/16	0	4/30/16	0	5/28/16	0.03	6/25/16	0
4/3/16	0.18	5/1/16	0	5/29/16	0	6/26/16	0
4/4/16	0.11	5/2/16	0	5/30/16	0	6/27/16	0
4/5/16	0	5/3/16	0	5/31/16	0	6/28/16	0
4/6/16	0	5/4/16	0	6/1/16	0	6/29/16	0
4/7/16	0	5/5/16	0	6/2/16	0	6/30/16	0
4/8/16	0	5/6/16		6/3/16	0	7/1/16	0
4/9/16	0	5/7/16	0	6/4/16	0	7/2/16	0
4/10/16	0	5/8/16	0.02	6/5/16	0	7/3/16	0
4/11/16	0	5/9/16	0	6/6/16	0	7/4/16	0
4/12/16	0.44	5/10/16	0	6/7/16	0	7/5/16	0
4/13/16	0.03	5/11/16	0	6/8/16	0	7/6/16	0
4/14/16	0.17	5/12/16	0	6/9/16	0.07	7/7/16	0.07
4/15/16	0	5/13/16	0	6/10/16	0	7/8/16	0.18
4/16/16	0	5/14/16	0	6/11/16	0.1	7/9/16	0.02
4/17/16	0	5/15/16	0	6/12/16	0	7/10/16	0
4/18/16	0	5/16/16	0	6/13/16	0	7/11/16	
4/19/16	0	5/17/16	0	6/14/16	0.05	7/12/16	0
4/20/16	0	5/18/16	0	6/15/16	0	7/13/16	0
4/21/16	0	5/19/16	0.22	6/16/16	0	7/14/16	0
4/22/16	0.02	5/20/16	0	6/17/16	0.34	7/15/16	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
7/16/16	0	8/13/16	0	9/10/16	0	10/8/16	0.65
7/17/16	0	8/14/16	0	9/11/16	0	10/9/16	0.21
7/18/16	0	8/15/16	0	9/12/16	0	10/10/16	0
7/19/16	0	8/16/16	0	9/13/16	0	10/11/16	0
7/20/16	0	8/17/16	0	9/14/16	0	10/12/16	0.01
7/21/16	0	8/18/16	0	9/15/16	0	10/13/16	1.74
7/22/16	0.21	8/19/16	0	9/16/16	0	10/14/16	1.49
7/23/16	0	8/20/16	0	9/17/16	0.09	10/15/16	0.68
7/24/16	0	8/21/16	0	9/18/16	0	10/16/16	0.52
7/25/16	0	8/22/16	0	9/19/16	0.01	10/17/16	0.04
7/26/16	0	8/23/16	0	9/20/16	0	10/18/16	0.12
7/27/16	0	8/24/16	0	9/21/16	0	10/19/16	0.18
7/28/16	0	8/25/16	0	9/22/16	0	10/20/16	1.17
7/29/16	0	8/26/16	0	9/23/16	0	10/21/16	0.01
7/30/16	0	8/27/16	0	9/24/16	0	10/22/16	0.04
7/31/16	0	8/28/16	0	9/25/16	0	10/23/16	0.11
8/1/16	0	8/29/16	0	9/26/16	0	10/24/16	0.13
8/2/16	0	8/30/16	0	9/27/16	0	10/25/16	0.02
8/3/16	0	8/31/16	0	9/28/16	0	10/26/16	1.46
8/4/16	0	9/1/16	0	9/29/16	0	10/27/16	0.07
8/5/16	0	9/2/16	0	9/30/16	0	10/28/16	0.01
8/6/16	0	9/3/16	0	10/1/16	0.1	10/29/16	0.17
8/7/16	0.03	9/4/16	0	10/2/16	0	10/30/16	0.23
8/8/16	0	9/5/16	0	10/3/16	0.01	10/31/16	0.75
8/9/16	0	9/6/16	0	10/4/16	0.11	11/1/16	0.26
8/10/16	0	9/7/16	0.02	10/5/16	0.03	11/2/16	0.48
8/11/16	0	9/8/16	0	10/6/16	0.34	11/3/16	0
8/12/16	0	9/9/16	0	10/7/16	0.08	11/4/16	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/5/16	0.94	12/3/16	0.06	12/31/16	0	1/28/17	0
11/6/16	0.21	12/4/16	0.17	1/1/17	0.16	1/29/17	0
11/7/16	0.05	12/5/16	0.23	1/2/17	0	1/30/17	0
11/8/16	0	12/6/16	0	1/3/17	0	1/31/17	0.01
11/9/16	0.19	12/7/16	0	1/4/17	0	2/1/17	0
11/10/16	0	12/8/16	0.04	1/5/17	0	2/2/17	0
11/11/16	0	12/9/16	0.29	1/6/17	0	2/3/17	0.66
11/12/16	0.09	12/10/16	0.21	1/7/17	0	2/4/17	0.71
11/13/16	0.25	12/11/16	0.06	1/8/17	0.56	2/5/17	0.68
11/14/16	0.24	12/12/16	0.02	1/9/17	0.06	2/6/17	0.39
11/15/16	1.02	12/13/16	0	1/10/17	0.1	2/7/17	0
11/16/16	0	12/14/16	0	1/11/17	0	2/8/17	0.76
11/17/16	0	12/15/16	0	1/12/17	0	2/9/17	1.55
11/18/16	0	12/16/16	0	1/13/17	0	2/10/17	0.06
11/19/16	0.1	12/17/16	0	1/14/17	0	2/11/17	0.01
11/20/16	0.1	12/18/16	0	1/15/17	0	2/12/17	0
11/21/16	0.03	12/19/16	0.55	1/16/17	0	2/13/17	0
11/22/16	0.52	12/20/16	0.01	1/17/17	1.52	2/14/17	0.23
11/23/16	0.26	12/21/16	0	1/18/17	1.21	2/15/17	1.65
11/24/16	1.16	12/22/16	0.36	1/19/17	0.13	2/16/17	0.46
11/25/16	0.05	12/23/16	0.61	1/20/17	0	2/17/17	0
11/26/16	0.52	12/24/16	0	1/21/17	0.04	2/18/17	0.13
11/27/16	0.42	12/25/16	0	1/22/17	0.12	2/19/17	0.12
11/28/16	0	12/26/16	0.39	1/23/17	0	2/20/17	0.2
11/29/16	0.06	12/27/16	0	1/24/17	0	2/21/17	0.22
11/30/16	0.19	12/28/16	0	1/25/17	0	2/22/17	0.01
12/1/16	0	12/29/16	0.13	1/26/17	0	2/23/17	0.03
12/2/16	0.2	12/30/16	0.06	1/27/17	0	2/24/17	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
2/25/17	0	3/25/17	0.01	4/22/17	0.13	5/20/17	0
2/26/17	0.26	3/26/17	0.31	4/23/17	0.21	5/21/17	0
2/27/17	0.46	3/27/17	0.08	4/24/17	0.02	5/22/17	0
2/28/17	0	3/28/17	0.08	4/25/17	0.01	5/23/17	0
3/1/17	0	3/29/17	0.41	4/26/17	0.04	5/24/17	0
3/2/17	0.07	3/30/17	0.01	4/27/17	0.02	5/25/17	0
3/3/17	0.59	3/31/17	0	4/28/17	0.06	5/26/17	0
3/4/17	0.03	4/1/17	0.06	4/29/17	0.06	5/27/17	0
3/5/17	0.11	4/2/17	0.05	4/30/17	0.05	5/28/17	0
3/6/17	0	4/3/17	0	5/1/17	0.07	5/29/17	0
3/7/17	0.46	4/4/17	0.09	5/2/17	0.13	5/30/17	0
3/8/17	0.03	4/5/17	0.51	5/3/17	0.19	5/31/17	0.05
3/9/17	0.53	4/6/17	0.27	5/4/17	0.36	6/1/17	0
3/10/17	0.02	4/7/17	0.37	5/5/17	0.19	6/2/17	0
3/11/17	0.28	4/8/17	0.06	5/6/17	0.43	6/3/17	0
3/12/17	0.02	4/9/17	0.01	5/7/17	0	6/4/17	0
3/13/17	0.51	4/10/17	0.35	5/8/17	0	6/5/17	0
3/14/17	0.36	4/11/17	0.01	5/9/17	0	6/6/17	0
3/15/17	0.71	4/12/17	0.87	5/10/17	0	6/7/17	0.02
3/16/17	0	4/13/17	0.13	5/11/17	0.38	6/8/17	0.27
3/17/17	0.77	4/14/17	0.02	5/12/17	0.19	6/9/17	0
3/18/17	0.47	4/15/17	0	5/13/17	0.08	6/10/17	0
3/19/17	0	4/16/17	0	5/14/17	0.01	6/11/17	0
3/20/17	0	4/17/17	0.06	5/15/17	0.28	6/12/17	0
3/21/17	0.17	4/18/17	0.22	5/16/17	0.14	6/13/17	0
3/22/17	0	4/19/17	0.38	5/17/17	0	6/14/17	0
3/23/17	0.25	4/20/17	0	5/18/17	0	6/15/17	0.9
3/24/17	0.45	4/21/17	0	5/19/17	0	6/16/17	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
6/17/17	0.01	7/15/17	0	8/12/17	0.02	9/9/17	0
6/18/17	0	7/16/17	0	8/13/17	0	9/10/17	0
6/19/17	0	7/17/17	0	8/14/17	0	9/11/17	0
6/20/17	0	7/18/17	0	8/15/17	0	9/12/17	0
6/21/17	0	7/19/17	0	8/16/17	0	9/13/17	0
6/22/17	0	7/20/17	0	8/17/17	0	9/14/17	0
6/23/17	0	7/21/17	0	8/18/17	0	9/15/17	0
6/24/17	0	7/22/17	0	8/19/17	0	9/16/17	0
6/25/17	0	7/23/17	0	8/20/17	0	9/17/17	0.06
6/26/17	0	7/24/17	0	8/21/17	0	9/18/17	0.17
6/27/17	0	7/25/17	0	8/22/17	0	9/19/17	0.27
6/28/17	0	7/26/17	0	8/23/17	0	9/20/17	0.04
6/29/17	0	7/27/17	0	8/24/17	0	9/21/17	0
6/30/17	0	7/28/17	0	8/25/17	0	9/22/17	0
7/1/17	0	7/29/17	0	8/26/17	0	9/23/17	0
7/2/17	0	7/30/17	0	8/27/17	0	9/24/17	0
7/3/17	0	7/31/17	0	8/28/17	0	9/25/17	0.02
7/4/17	0	8/1/17	0	8/29/17	0	9/26/17	0
7/5/17	0	8/2/17	0	8/30/17	0	9/27/17	0
7/6/17	0	8/3/17	0	8/31/17	0	9/28/17	0
7/7/17	0	8/4/17	0	9/1/17	0	9/29/17	0.04
7/8/17	0	8/5/17	0	9/2/17	0	9/30/17	0.03
7/9/17	0	8/6/17	0	9/3/17	0	10/1/17	0
7/10/17	0	8/7/17	0	9/4/17	0	10/2/17	0
7/11/17	0	8/8/17	0	9/5/17	0	10/3/17	0
7/12/17	0	8/9/17	0	9/6/17	0	10/4/17	0
7/13/17	0	8/10/17	0	9/7/17	0	10/5/17	0
7/14/17	0	8/11/17	0	9/8/17	0	10/6/17	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
10/7/17	0.08	11/4/17	0.01	12/2/17	0.61	12/30/17	0.08
10/8/17	0	11/5/17		12/3/17	0.04	12/31/17	0
10/9/17	0	11/6/17	0	12/4/17	0	1/1/18	0
10/10/17	0.01	11/7/17		12/5/17	0	1/2/18	0
10/11/17	0	11/8/17	0.13	12/6/17	0	1/3/18	0
10/12/17	0.15	11/9/17	0.27	12/7/17	0	1/4/18	0.13
10/13/17	0	11/10/17	0	12/8/17	0	1/5/18	0.39
10/14/17	0	11/11/17	0.14	12/9/17	0	1/6/18	0.23
10/15/17	0	11/12/17	0.57	12/10/17	0	1/7/18	0.4
10/16/17	0	11/13/17	0.61	12/11/17	0	1/8/18	0.11
10/17/17	0.05	11/14/17	0.07	12/12/17	0	1/9/18	0.29
10/18/17	1.04	11/15/17	0.64	12/13/17	0	1/10/18	0.1
10/19/17	0.41	11/16/17	0.08	12/14/17	0	1/11/18	0.88
10/20/17	0.11	11/17/17	0	12/15/17	0.02	1/12/18	0.1
10/21/17	0.19	11/18/17	0	12/16/17	0.1	1/13/18	0
10/22/17	0.04	11/19/17	0.38	12/17/17	0.01	1/14/18	0
10/23/17	0	11/20/17	0.49	12/18/17	0.69	1/15/18	0.07
10/24/17	0	11/21/17	1.26	12/19/17	1.14	1/16/18	0.18
10/25/17	0	11/22/17	0.56	12/20/17	0.07	1/17/18	0.38
10/26/17	0	11/23/17	0.1	12/21/17	0	1/18/18	0.67
10/27/17	0	11/24/17	0	12/22/17	0.06	1/19/18	0.02
10/28/17	0	11/25/17	0.22	12/23/17	0	1/20/18	0.05
10/29/17	0	11/26/17	0.2	12/24/17	0.11	1/21/18	0.22
10/30/17	0	11/27/17	0	12/25/17	0.07	1/22/18	0.14
10/31/17	0	11/28/17	0.57	12/26/17	0	1/23/18	0.8
11/1/17	0	11/29/17	0.01	12/27/17	0	1/24/18	0.39
11/2/17	0.08	11/30/17	0.26	12/28/17	0.09	1/25/18	0.12
11/3/17	0	12/1/17	0.21	12/29/17	1.37	1/26/18	0.18

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/27/18	0.56	2/24/18	0.03	3/24/18	0.16	4/21/18	0.08
1/28/18	0.03	2/25/18	0.06	3/25/18	0	4/22/18	0
1/29/18	0.89	2/26/18	0	3/26/18	0.06	4/23/18	0
1/30/18	0	2/27/18	0.51	3/27/18	0	4/24/18	0
1/31/18	0	2/28/18	0.37	3/28/18	0	4/25/18	0
2/1/18	0.57	3/1/18	0.02	3/29/18	0	4/26/18	0
2/2/18	0.02	3/2/18	0.16	3/30/18	0	4/27/18	0
2/3/18	0.11	3/3/18	0	3/31/18	0	4/28/18	0.37
2/4/18	0.02	3/4/18	0.07	4/1/18	0.14	4/29/18	0
2/5/18	0	3/5/18	0	4/2/18	0	4/30/18	0
2/6/18	0	3/6/18	0	4/3/18	0	5/1/18	0.01
2/7/18	0	3/7/18	0.05	4/4/18	0.27	5/2/18	0
2/8/18	0.08	3/8/18	0.45	4/5/18	0.19	5/3/18	0
2/9/18	0.05	3/9/18	0	4/6/18	0	5/4/18	0
2/10/18	0	3/10/18	0	4/7/18	0.74	5/5/18	0.02
2/11/18	0	3/11/18	0	4/8/18	0.27	5/6/18	0
2/12/18	0	3/12/18	0	4/9/18	0	5/7/18	0
2/13/18	0.16	3/13/18	0.16	4/10/18	0.2	5/8/18	0.03
2/14/18	0.09	3/14/18	0.01	4/11/18	0.25	5/9/18	0
2/15/18	0.01	3/15/18	0	4/12/18	0.11	5/10/18	0.01
2/16/18	0.07	3/16/18	0	4/13/18	0.38	5/11/18	0
2/17/18	0.25	3/17/18	0	4/14/18	1.83	5/12/18	0
2/18/18	0.03	3/18/18	0	4/15/18	0.11	5/13/18	0
2/19/18	0	3/19/18	0	4/16/18	0.25	5/14/18	0
2/20/18	0	3/20/18	0	4/17/18	0.01	5/15/18	0
2/21/18	0.02	3/21/18	0.14	4/18/18	0	5/16/18	0
2/22/18	0	3/22/18	0.36	4/19/18	0	5/17/18	0
2/23/18	0	3/23/18	0.35	4/20/18	0	5/18/18	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
5/19/18	0.02	6/16/18	0	7/14/18	0	8/11/18	0.02
5/20/18	0	6/17/18	0	7/15/18	0	8/12/18	0
5/21/18	0	6/18/18	0	7/16/18	0	8/13/18	0
5/22/18	0	6/19/18	0	7/17/18	0	8/14/18	0
5/23/18	0	6/20/18	0	7/18/18	0	8/15/18	0
5/24/18	0	6/21/18	0	7/19/18	0	8/16/18	0
5/25/18	0	6/22/18	0.04	7/20/18	0	8/17/18	0
5/26/18	0	6/23/18	0.08	7/21/18	0	8/18/18	0
5/27/18	0	6/24/18	0.14	7/22/18	0	8/19/18	0
5/28/18	0	6/25/18	0.02	7/23/18	0	8/20/18	0
5/29/18	0	6/26/18	0	7/24/18	0	8/21/18	0
5/30/18	0	6/27/18	0	7/25/18	0	8/22/18	0
5/31/18	0.02	6/28/18	0	7/26/18	0	8/23/18	0
6/1/18	0	6/29/18	0	7/27/18	0	8/24/18	0
6/2/18	0	6/30/18	0.01	7/28/18	0	8/25/18	0
6/3/18	0.02	7/1/18	0	7/29/18	0	8/26/18	0.02
6/4/18	0.03	7/2/18	0	7/30/18	0	8/27/18	0
6/5/18	0	7/3/18	0	7/31/18	0	8/28/18	0
6/6/18	0	7/4/18	0	8/1/18	0	8/29/18	0
6/7/18	0	7/5/18	0	8/2/18	0	8/30/18	0
6/8/18	0.23	7/6/18	0	8/3/18	0	8/31/18	0
6/9/18	0.17	7/7/18	0	8/4/18	0	9/1/18	0
6/10/18	0.1	7/8/18	0	8/5/18	0	9/2/18	0
6/11/18	0	7/9/18	0	8/6/18	0	9/3/18	0
6/12/18	0	7/10/18	0	8/7/18	0	9/4/18	0
6/13/18	0.11	7/11/18	0	8/8/18	0	9/5/18	0
6/14/18	0	7/12/18	0	8/9/18	0	9/6/18	0
6/15/18	0	7/13/18	0	8/10/18	0	9/7/18	0.07

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
9/9/18	0.19	10/7/18	0	11/4/18	0.12	12/2/18	0.04
9/10/18	0.01	10/8/18	0.03	11/5/18	0	12/3/18	0
9/11/18	0.05	10/9/18	0.03	11/6/18	0.05	12/4/18	0
9/12/18	0	10/10/18	0	11/7/18	0.05	12/5/18	0
9/13/18	0.19	10/11/18	0	11/8/18	0	12/6/18	0
9/14/18	0.29	10/12/18	0	11/9/18	0.1	12/7/18	0
9/15/18	0.09	10/13/18	0	11/10/18	0.01	12/8/18	0.01
9/16/18	0.19	10/14/18	0	11/11/18	0	12/9/18	0.53
9/17/18	0	10/15/18	0	11/12/18	0	12/10/18	0.09
9/18/18	0	10/16/18	0	11/13/18	0	12/11/18	0.51
9/19/18	0.04	10/17/18	0	11/14/18	0.04	12/12/18	0.08
9/20/18	0.18	10/18/18	0	11/15/18	0.01	12/13/18	0.22
9/21/18	0.06	10/19/18	0	11/16/18	0.01	12/14/18	0.01
9/22/18	0.05	10/20/18	0	11/17/18	0	12/15/18	0.09
9/23/18	0	10/21/18	0	11/18/18	0	12/16/18	0.48
9/24/18	0	10/22/18	0	11/19/18	0	12/17/18	0.57
9/25/18	0	10/23/18	0	11/20/18	0	12/18/18	0.59
9/26/18	0	10/24/18	0	11/21/18	0.13	12/19/18	0
9/27/18	0	10/25/18	0	11/22/18	0.5	12/20/18	0.24
9/28/18	0	10/26/18	1.05	11/23/18	0.59	12/21/18	0
9/29/18		10/27/18	0.89	11/24/18	0	12/22/18	0.33
9/30/18	0	10/28/18	0.32	11/25/18	0	12/23/18	0.68
10/1/18	0.01	10/29/18	0.01	11/26/18	1.37	12/24/18	0
10/2/18	0	10/30/18	0.04	11/27/18	0.7	12/25/18	0
10/3/18	0	10/31/18	0.01	11/28/18	0.24	12/26/18	0.1
10/4/18	0	11/1/18	0.04	11/29/18	0	12/27/18	0.05
10/5/18	0.01	11/2/18	0.19	11/30/18	0.18	12/28/18	0.37
10/6/18	0	11/3/18	0.17	12/1/18	0.06	12/29/18	0.62

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/30/18	0	1/27/19	0	2/24/19	0	3/24/19	0
12/31/18	0	1/28/19	0	2/25/19	0	3/25/19	0.16
1/1/19	0	1/29/19	0	2/26/19	0	3/26/19	0.04
1/2/19	0	1/30/19	0	2/27/19	0	3/27/19	0
1/3/19	0.69	1/31/19	0	2/28/19	0	3/28/19	0
1/4/19	0.11	2/1/19	0.51	3/1/19	0	3/29/19	0
1/5/19	0.08	2/2/19	0	3/2/19	0	3/30/19	0
1/6/19	0.35	2/3/19	0.11	3/3/19	0	3/31/19	0
1/7/19	0	2/4/19	0.12	3/4/19	0	4/1/19	0
1/8/19	0.2	2/5/19	0	3/5/19	0	4/2/19	0
1/9/19	0.25	2/6/19	0	3/6/19	0.1	4/3/19	0.01
1/10/19	0.12	2/7/19	0	3/7/19	0.15	4/4/19	0.07
1/11/19	0	2/8/19	0.39	3/8/19	0.07	4/5/19	0.41
1/12/19	0	2/9/19	0.23	3/9/19	0	4/6/19	0.22
1/13/19	0	2/10/19	0.11	3/10/19	0	4/7/19	0.23
1/14/19	0	2/11/19	0.89	3/11/19	0.28	4/8/19	0.07
1/15/19	0	2/12/19	0.52	3/12/19	0.49	4/9/19	0.19
1/16/19	0	2/13/19	0	3/13/19	0	4/10/19	0.14
1/17/19	0.11	2/14/19	0.14	3/14/19	0	4/11/19	0.55
1/18/19	0.34	2/15/19	0.01	3/15/19	0	4/12/19	0.15
1/19/19	0.08	2/16/19	0.27	3/16/19	0	4/13/19	0.05
1/20/19	0	2/17/19	0	3/17/19	0	4/14/19	0.01
1/21/19	0	2/18/19	0.09	3/18/19	0	4/15/19	0
1/22/19	0.49	2/19/19	0.03	3/19/19	0	4/16/19	0.14
1/23/19	0.16	2/20/19	0.21	3/20/19	0	4/17/19	0
1/24/19	0.06	2/21/19	0	3/21/19	0	4/18/19	0.1
1/25/19	0	2/22/19	0.13	3/22/19	0.01	4/19/19	0.21
1/26/19	0	2/23/19	0.12	3/23/19	0	4/20/19	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/21/19	0	5/21/19	0	6/18/19	0	7/16/19	0
4/22/19	0.13	5/22/19	0	6/19/19	0	7/17/19	0.02
4/23/19	0	5/23/19	0	6/20/19		7/18/19	0.04
4/24/19	0	5/24/19	0	6/21/19	0	7/19/19	0
4/25/19	0	5/25/19	0.23	6/22/19	0	7/20/19	0
4/26/19	0	5/26/19	0	6/23/19	0	7/21/19	0
4/29/19	0	5/27/19	0	6/24/19	0	7/22/19	0
4/30/19	0	5/28/19	0	6/25/19	0	7/23/19	0
5/1/19	0	5/29/19	0	6/26/19	0	7/24/19	0
5/2/19	0	5/30/19	0	6/27/19	0	7/25/19	0
5/3/19	0	5/31/19	0	6/28/19	0	7/26/19	0
5/4/19	0	6/1/19	0	6/29/19	0	7/27/19	0
5/5/19	0	6/2/19	0	6/30/19	0	7/28/19	0
5/6/19	0	6/3/19	0	7/1/19	0	7/29/19	0
5/7/19	0	6/4/19	0	7/2/19	0.28	7/30/19	0
5/8/19	0	6/5/19	0	7/3/19	0	7/31/19	0
5/9/19	0	6/6/19	0	7/4/19	0	8/1/19	0
5/10/19	0	6/7/19	0	7/5/19	0	8/2/19	0.2
5/11/19	0	6/8/19	0	7/6/19	0	8/3/19	0
5/12/19	0	6/9/19	0	7/7/19	0.01	8/4/19	0
5/13/19	0	6/10/19	0	7/8/19	0.01	8/5/19	0
5/14/19	0.05	6/11/19	0	7/9/19	0.12	8/6/19	0
5/15/19	0.03	6/12/19	0	7/10/19	0.11	8/7/19	0
5/16/19	0.16	6/13/19	0	7/11/19	0	8/8/19	0
5/17/19	0.15	6/14/19	0	7/12/19	0	8/9/19	0
5/18/19	0	6/15/19	0	7/13/19	0	8/10/19	0.18
5/19/19	0	6/16/19	0	7/14/19	0	8/11/19	0
5/20/19	0	6/17/19	0	7/15/19	0.04	8/12/19	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/13/19	0	9/10/19	0	10/8/19	0.24	11/6/19	0
8/14/19	0	9/11/19	0	10/9/19	0	11/7/19	0
8/15/19	0	9/12/19	0.14	10/10/19	0	11/8/19	0
8/16/19	0	9/13/19	0	10/11/19	0	11/9/19	0.01
8/17/19	0	9/14/19	0.01	10/12/19	0	11/10/19	0
8/18/19	0	9/15/19	0.07	10/13/19	0	11/11/19	0
8/19/19	0	9/16/19	0	10/14/19	0	11/12/19	0.07
8/20/19	0	9/17/19	0.13	10/15/19	0	11/13/19	0
8/21/19	0.1	9/18/19	0.06	10/16/19	0.23	11/14/19	0
8/22/19	0	9/19/19	0	10/17/19	0.05	11/15/19	0.08
8/23/19	0	9/20/19	0	10/18/19	0.54	11/16/19	0
8/24/19	0	9/21/19		10/19/19	0.24	11/17/19	0.03
8/25/19	0	9/22/19	0.01	10/20/19	0.06	11/19/19	0.06
8/26/19	0	9/23/19	0.01	10/21/19	0.04	11/20/19	0
8/27/19	0	9/24/19	0	10/22/19	0	11/21/19	0
8/28/19	0	9/25/19	0	10/23/19	0	11/22/19	0
8/29/19	0.02	9/26/19	0.02	10/24/19	0	11/23/19	0
8/30/19	0	9/27/19	0.03	10/25/19	0.1	11/24/19	0.02
8/31/19	0.01	9/28/19	0	10/26/19	0	11/25/19	0.05
9/1/19	0	9/29/19	0.04	10/27/19	0	11/26/19	0
9/2/19	0	9/30/19	0	10/28/19	0	11/27/19	0
9/3/19	0	10/1/19	0	10/29/19	0	11/28/19	0
9/4/19	0	10/2/19	0	10/30/19	0	11/29/19	0
9/5/19	0	10/3/19	0.02	10/31/19	0	11/30/19	0
9/6/19	0	10/4/19	0	11/1/19	0	12/1/19	0.01
9/7/19	0.41	10/5/19	0	11/2/19	0	12/2/19	0
9/8/19	0	10/6/19	0	11/3/19	0	12/3/19	0
9/9/19	0.06	10/7/19	0	11/4/19	0	12/4/19	0

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/5/19	0	1/2/20	0	1/30/20	0.02	2/27/20	0
12/6/19	0	1/3/20	0.06	1/31/20	0.27	2/28/20	0.07
12/7/19	0.04	1/4/20	0.03	2/1/20	0.72	2/29/20	0.09
12/8/19	0	1/5/20	0.1	2/2/20	0	3/1/20	0
12/9/19	0	1/6/20	0.07	2/3/20	0	3/2/20	0
12/10/19	0.03	1/7/20	0.03	2/4/20	0.03	3/3/20	0
12/11/19	0.08	1/8/20	0	2/5/20	0.18	3/4/20	0
12/12/19	0.07	1/9/20	0	2/6/20	0.43	3/5/20	0.07
12/13/19	0	1/10/20	0.15	2/7/20	0.16	3/6/20	0.11
12/14/19	0.2	1/11/20	0	2/8/20	0	3/7/20	0.01
12/15/19	0.12	1/12/20	0.06	2/9/20	0	3/8/20	0
12/16/19	0	1/13/20	0.03	2/10/20	0	3/9/20	0
12/17/19	0	1/14/20	0	2/11/20	0.01	3/10/20	0
12/18/19	0.05	1/15/20	0	2/12/20	0.04	3/11/20	0.01
12/19/19	0.7	1/16/20	0	2/13/20	0.03	3/12/20	0
12/20/19	1.57	1/17/20	0	2/14/20	0.01	3/13/20	0.05
12/21/19	0.17	1/18/20	0.21	2/15/20	0.04	3/14/20	0
12/22/19	0.02	1/19/20	0.01	2/16/20	0.06	3/15/20	0
12/23/19	0.09	1/20/20	0	2/17/20	0	3/16/20	0
12/24/19	0	1/21/20	0.65	2/18/20	0	3/17/20	0
12/25/19	0	1/22/20	0	2/19/20	0	3/18/20	0
12/26/19	0	1/23/20	0.37	2/20/20	0	3/19/20	0
12/27/19	0	1/24/20	0.47	2/21/20	0	3/20/20	0
12/28/19	0	1/25/20	0.04	2/22/20	0	3/21/20	0
12/29/19	0	1/26/20	0.15	2/23/20	0.13	3/22/20	0
12/30/19	0.01	1/27/20	0.33	2/24/20	0	3/23/20	0.03
12/31/19	0.08	1/28/20	0.34	2/25/20	0	3/24/20	0
1/1/20	0	1/29/20	0.02	2/26/20	0	3/25/20	0.08

Precipitation data for Seattle Boeing Field, WA US Station, WA USW00024234

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/26/20	0	4/23/20	0.1	5/21/20	0.17		
3/27/20	0	4/24/20	0	5/22/20	0.1		
3/28/20	0.19	4/25/20	0.39	5/23/20	0		
3/29/20	0.15	4/26/20	0.03	5/24/20	0		
3/30/20	0.4	4/27/20	0.08	5/25/20	0.01		
3/31/20	0.02	4/28/20	0	5/26/20	0		
4/1/20	0	4/29/20	0	5/27/20	0		
4/2/20	0	4/30/20	0	5/28/20	0		
4/3/20	0	5/1/20	0	5/29/20	0		
4/4/20	0	5/2/20	0.11	5/30/20	0.72		
4/5/20	0	5/3/20	0.03	5/31/20	0.01		
4/6/20	0	5/4/20	0	6/1/20	0		
4/7/20	0	5/5/20	0	6/2/20	0		
4/8/20	0	5/6/20	0				
4/9/20	0	5/7/20	0				
4/10/20	0	5/8/20	0				
4/11/20	0	5/9/20	0				
4/12/20	0	5/10/20	0				
4/13/20	0	5/11/20	0				
4/14/20	0	5/12/20	0.01				
4/15/20	0	5/13/20	0				
4/16/20	0	5/14/20	0.05				
4/17/20	0	5/15/20	0				
4/18/20	0.01	5/16/20	0.39				
4/19/20	0	5/17/20	0.09				
4/20/20	0	5/18/20	0				
4/21/20	0	5/19/20	0				
4/22/20	0.27	5/20/20	0				